

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

_____)	
ASTRAZENECA LP and)	
ASTRAZENECA AB,)	
)	CIVIL ACTION NO. 05-5142 (RMB)(AMD)
Plaintiffs,)	
)	
v.)	
)	
IVAX PHARMACEUTICALS, INC.,)	
)	
Defendant.)	
_____)	

JOINT STIPULATION AND PROPOSED ORDER

WHEREAS, AstraZeneca LP and AstraZeneca AB (collectively "AstraZeneca") and Ivax Pharmaceuticals, Inc. ("Ivax") seek to resolve a discovery dispute relating to Ivax's service on June 2, 2008 of the Second Supplemental Expert Report of Professor Iain M. Cockburn ("Cockburn Second Supplemental"), and AstraZeneca's objections and testimony in response thereto;

IT IS HEREBY STIPULATED AND AGREED, subject to the approval and Order of the Court, that:

1. Professor Cockburn will be deposed on June 4, 2008 on the subject matter of his reports disclosed prior to the Cockburn Second Supplemental Report;
2. Any redirect examination by Ivax relating to testimony at the June 4, 2008 deposition will be conducted at the June 4, 2008 deposition and cannot be asked at any later deposition;

3. Professor Cockburn will be made available at the New York offices of Ropes & Gray LLP for a second deposition before July 18, 2008, during which Professor Cockburn will be deposed on the subject matter of the Cockburn Second Supplemental Report;

4. To the extent that Professor Cockburn testifies at his June 4, 2008 deposition concerning the Cockburn Second Supplemental Report, that testimony will remain in the record, but will neither impact the scope of Professor Cockburn's second deposition nor AstraZeneca's ability to depose Professor Cockburn about that testimony during such second deposition;

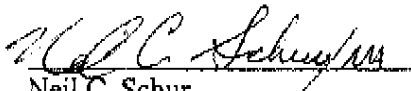
5. The total time for the two depositions of Professor Cockburn will not exceed 7 hours on the record, exclusive of breaks; and

6. Ivax will not object to testimony or opinions offered at trial on behalf of AstraZeneca by Dr. Christopher Velturo that address the subject matters set forth in the Cockburn Second Supplemental Report on the basis that such testimony or opinions were not included in a prior expert report, provided that any additional quantitative analysis by Dr. Velturo is disclosed in writing to Ivax thirty days before the commencement of trial

AGREED TO AND STIPULATED BY:

Dated: June 3, 2008


By:


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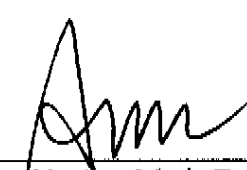
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*Attorneys for Plaintiffs
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AB*

SO ORDERED:

Dated: _____

6/4/08



Honorable Ann Marie Donio
United States Magistrate Judge